

COA No. 34902-1-III

COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

WILLIE C. ASHER, JR.,

Appellant.

BRIEF OF APPELLANT

Kenneth H. Kato, WSBA # 6400
Attorney for Appellant
1020 N. Washington St.
Spokane, WA 99201
(509) 220-2237

TABLE OF CONTENTS

I. ASSIGNMENT OF ERROR.....	1
1. The evidence was insufficient to support the conviction for second degree assault with a firearm enhancement because the State failed to disprove self-defense beyond a reasonable doubt.....	1
2. The court erred by failing to consider the defense request for an exceptional sentence below the standard range.....	1
<i>Issues Pertaining to Assignments of Error</i>	
A. Was the evidence insufficient to support the conviction for second degree assault with a firearm enhancement when the State failed to disprove self-defense beyond a reasonable doubt? (Assignment of Error 1).....	1
B. Did the court abuse its discretion by failing to consider the defense request for an exceptional sentence below the standard range? (Assignment of Error 2).....	1
II. STATEMENT OF THE CASE.....	1
III. ARGUMENT.....	13
A. The State's evidence was insufficient to support the conviction for second degree assault with a firearm enhancement as it failed to disprove self-defense beyond a reasonable doubt.....	13
B. The court erred by failing to consider the defense request for an exceptional sentence below the standard range.....	15

IV. CONCLUSION.....	17
---------------------	----

TABLE OF AUTHORITIES

Table of Cases

<i>Bowcutt v. Delta N. Star Corp.</i> , 95 Wn. App. 320, 976 P.2d 643 (1999).....	17
<i>In re Winship</i> , 397 U.S. 358, 90 S. Ct. 1068, 25 L. Ed.2d 368 (1970).....	13
<i>State v. Acosta</i> , 101 Wn.2d 612, 683 P.2d 1069 (1984).....	13
<i>State v. Callahan</i> , 87 Wn App. 925, 943 P.2d 676 (1997).....	14
<i>State v. Clemens</i> , 78 Wn. App. 458, 898 P.2d 324 (1995).....	15
<i>State v. Jeannotte</i> , 133 Wn.2d 847, 947 P.2d 1192 (1997).....	15
<i>State v. Green</i> , 94 Wn.2d 216, 616 P.2d 628 (1980).....	10
<i>State v. Hutsell</i> , 120 Wn.2d 913, 845 P.2d 1325 (1993).....	15
<i>State v. Hutton</i> , 7 Wn. App. 726, 502 P.3d 1037 (1972).....	14, 15
<i>State v. Janes</i> , 121 Wn.2d 220, 850 P.2d 495 (1993).....	14
<i>State v. Redwine</i> , 72 Wn. App. 625, 865 P.2d 552, review denied, 124 Wn.2d 1012 (1994).....	13
<i>State v. Whitfield</i> , 99 Wn. App. 331, 994 P.2d 222 (1999).....	16
<i>State v. Smith</i> , 124 Wn. App. 417, 102 P.3d 158 (2004).....	17

Constitutional Provisions

U.S. Const. amend. 5.....	13
U.S. Const. amend. 14.....	13

Wash. Const. art. 1, § 3.....	13
-------------------------------	----

Statute

RCW 9.94A.535(1)(a).....	15
--------------------------	----

I. ASSIGNMENTS OF ERROR

1. The evidence was insufficient to support the conviction for second degree assault with a firearm enhancement because the State failed to disprove self-defense beyond a reasonable doubt.

2. The court erred by failing to consider the defense request for an exceptional sentence below the standard range.

Issues Pertaining to Assignments of Error

A. Was the evidence insufficient to support the conviction for second degree assault with a firearm enhancement when the State failed to disprove self-defense beyond a reasonable doubt? (Assignment of Error 1).

B. Did the court abuse its discretion by failing to consider the defense request for an exceptional sentence below the standard range? (Assignment of Error 2).

II. STATEMENT OF THE CASE

Willie C. Asher, Jr., was charged by information with one count of second degree assault and one count of harassment. Both counts included a firearm enhancement. (CP 12).

The first trial ended with a hung jury and an order for mistrial was entered on May 18, 2016. (CP 31). The case went to trial for a second time on 9/12/16. (9/12/16 RP 44).

William Manuel, a neighbor, knew both Mr. Asher and Tom Stephens, the purported victim. (9/12/16 RP 55). On November 11, 2011, he saw Mr. Asher pointing a gun at the ground near Mr. Stephens, who was about 15 feet away. (*Id.* at 59). Mr. Manuel was aware there was conflict between the two men. (*Id.* at 60).

Mr. Stephens said he had problems at his place with Mr. Asher involving guns and violence. (9/12/16 RP 73). Mr. Stephens had 30 acres of vacant land. (*Id.* at 75-76). He eventually divided the land into 10-acre parcels and Mr. Stephens moved onto the “north 10 acres” next to Mr. Asher’s house. (*Id.* at 81-82). At first, things were cordial. (*Id.* at 82-83).

Things went sour after Mr. Asher shot a horse he was having trouble with and then buried it next to Mr. Stephens’ fence by his roping arena. (9/12/16 RP 86-87). This incident occurred within a couple of years of Mr. Asher moved in. (*Id.* at 88). Mr. Stephens said ever since that summer, it was bad with Mr. Asher screaming, hollering, and cussing him out. (*Id.* at 89, 91). On the other hand, Mr. Stephens told Mr. Asher he would beat/kick his ass about 10, 12, or 15 times. (*Id.* at 92-93). He stopped when his words quit working against Mr. Asher. (*Id.* at 94). Both men had called the police about the other. (*Id.*).

On September 7, 2015, Mr. Stephens was taking care of his calves in the morning. (9/12/16 RP 94). Mr. Asher had torn down a fence and built a wire dog fence on Mr. Stephens' property against his panel fence. (*Id.* at 97). Since Mr. Stephens' calves were getting their legs skinned up on his neighbor's wire fence, he told Mr. Asher to move the fence over 6 inches. Mr. Asher answered by saying Mr. Stephens had a fucking problem and the argument started. (*Id.* at 97-98). Mr. Stephens told him the fence had to come down and he better get a surveyor before he moved any fences. (*Id.* at 98).

Mr. Asher got mad and swung a T-post across the fence at Mr. Stephens. (9/12/16 RP 102). Mr. Asher went back to his house after swinging the post at Mr. Stephens, who started toward his own house. (*Id.* at 106-08). Mr. Asher returned and called him back, whereupon Mr. Stephens got up on the second rung of his fence and pointed out the property line. (*Id.*). Mr. Asher was about 15 feet and 3 fences away when he took a gun out of the back of his pants, brought it up at an angle, and fired it. (*Id.* at 109). The bullet landed on Mr. Stephens' property. (*Id.* at 106). Mr. Stephens said he did not cross the line onto his neighbor's property. He stepped back after the shot, walked back to his house, and called

the sheriff. (*Id.* at 106-07, 109). Mr. Stephens acknowledged there had been a long-standing dispute between the men. (*Id.* at 109).

Mr. Stephens said he made no threats of harm to Mr. Asher. (9/14/16 RP 272). Even before September 7, he had told Mr. Asher his fence was on his property. (*Id.* at 275). On September 7, 2015, Mr. Stephens did not go onto Mr. Asher's property. (*Id.* at 278). After the shot, he turned around and walked back to his house. (*Id.* at 287). Mr. Stephens testified he made no threats to bash Mr. Asher's head in, to kill him, or to kick his ass. (*Id.* at 285). He acknowledged Mr. Asher had not threatened to kill him that day. (*Id.* a 287). Mr. Stephens said, however, that he had in the past told Mr. Asher he would kick his ass – but only when Mr. Asher said he would shoot him or his horses. (*Id.* at 320-21). Mr. Stephens said he did not know conflict would ensue if he told Mr. Asher about the fence. (*Id.* at 349).

Deputy Matthew Gould responded on September 7, 2015, to a call by Mr. Stephens about a dispute over a fence line where a gun was involved. (9/13/16 RP 120). Deputy Gould talked to Mr. Stephens, who was calm but upset. (*Id.* at 122-23). The deputy contacted Mr. Asher, who was waiting for them. (*Id.* at 125). Mr. Asher was detained in cuffs and another deputy took his statement.

(*Id.* at 127). Deputy Gould did not talk directly to Mr. Asher or his wife, Connie, from whom the gun was secured. (*Id.* at 128, 139).

Deputy Brandon Wilson also responded to the incident. (9/13/16 RP 149-50). Mr. Stephens called 911 first and Mr. Asher made a second 911 call. (*Id.* at 151). After contacting Mr. Stephens first, Deputy Wilson contacted Mr. Asher, who was at the front of his house. (*Id.* at 156-57). He was very angry and getting irritated with what the deputies were telling him to do. (*Id.* at 160). Since Mr. Asher was not doing what the deputies asked him to do, Deputy Wilson grabbed his left arm and put it behind his back to get control over him. (*Id.* at 162). Deputy Kravtsov did the same with his right arm. (*Id.*). Mr. Asher had a thousand-yard stare. (*Id.*). For safety, the deputies cuffed him. (*Id.* at 164). Deputy Wilson contacted Ms. Asher, who turned the firearm over to him. (*Id.* at 167). He transported Mr. Asher to jail. (*Id.* at 174). Deputy Wilson did not try to locate the fired bullet. (*Id.* at 191).

Deputy Stanislav Kravtsov also responded on September 7, 2015. (9/13/16 RP 197-99). He talked to a calm but upset Mr. Stephens and took a statement from him. (*Id.* at 205-06). The deputy decided to talk to Mr. Asher, who was in the driveway of his home. (*Id.* at 206). He was worked up and cursing. (*Id.* at 207-

10). Deputy Kravtsov described Mr. Asher as “verbally resistive.” (*Id.* at 214). The deputy interviewed Mr. Asher after reading him his rights and he agreed to talk. (*Id.* at 215). He said the argument was over the fence and Mr. Stephens told him he would tear the fence down and bash his head in. (*Id.* at 217). Mr. Stephens was trying to climb the fence. (*Id.*). Mr. Asher yelled at him and proceeded to draw his weapon and fired it. (*Id.* at 221). He wanted to scare Mr. Stephens. (*Id.* at 222).

The deputy testified Mr. Asher described the incident very similarly to what Mr. Stephens had described. Mr. Asher said Mr. Stephens threatened him so he fired the gun into the ground to scare him. (9/13/16 RP 240-42).

Lucy Tyson knew Mr. Asher and his wife. (9/14/16 RP 374). She recalled a church picnic at the Ashers in 2012 when Mr. Stephens plowed and kicked up dust that went toward the Asher home. (*Id.* at 378). In September or October 2012, she heard screaming and yelling where Mr. Stephens threatened to kill Mr. Asher, who was upset, concerned, and worried. (*Id.* at 381-91).

John Koch knew both Mr. Asher and Mr. Stephens. (9/14/16 RP 405-06). He rode horses with Mr. Asher. (*Id.*). The first time doing so, Mr. Koch testified Mr. Stephens came out yelling

obscurities and a bunch of other stuff at Mr. Asher. (*Id.* at 407-10). Another time while riding horses, he heard Mr. Stephens threaten to stomp Mr. Asher's head in and to kill his puppy. (*Id.* at 411-12). Mr. Asher told him he needed to go home and he backed off. (*Id.* at 412). On several other occasions, Mr. Stephens hurled vulgarities at Mr. Asher and threatened to kill him, stomp his head in, and kick his ass. (*Id.* at 413-14). About a dozen times this happened while Mr. Asher was on his own property. (*Id.* at 414). Mr. Koch said Mr. Stephens was always trying to pick a fight with Mr. Asher, who neither provoked his neighbor nor wanted to fight him. (*Id.* at 415-16). The last time Mr. Koch witnessed Mr. Stephens' conduct was in May 2015 when he came out calling him and Mr. Asher faggots and trying to spook his wife's horse. (*Id.* at 418). Mr. Koch did not return after that. (*Id.*).

Connie Asher testified that after they moved onto Garfield Road in February 2009, there had been no property line disputes or fences removed. (9/14/16 RP 431-33). Within the first year, relations with Mr. Stephens took a turn for the worse. (*Id.* at 440). Mr. Asher did not seek any contact with him. (*Id.* at 441). She said that while her husband was working in the yard, Mr. Stephens would come over to the fence at the property line and start arguing

with Mr. Asher. (*Id.*). Things got worse over time. (*Id.* at 443). Mr. Stephens got aggressive and threatened to stomp Mr. Asher's head in. (*Id.*). Arguments took place at the spot where Mr. Asher fed the horses. (*Id.* at 444). He took Mr. Stephens' threats seriously and was afraid of him. (*Id.* at 445). Mr. Asher got a temporary restraining order against Mr. Stephens in April 2011. (*Id.* at 446). Things got even worse after that with more threats by Mr. Stephens. (*Id.* at 447).

About 2011, Mr. Asher had put up a wire fence against the property line to prevent his dog from going through the panel fencing onto Mr. Stephens' property. (9/15/16 RP 450). Mr. Stephens had never said anything about this wire fence. (*Id.* at 463). On September 7, 2015, Ms. Asher was aware of the conflict between her husband and Mr. Stephens. (*Id.* at 465-66). Mr. Asher had not come back from his chores so she went looking for him. (*Id.* at 466). She heard Mr. Stephens say he was going to come over and stomp Mr. Asher's head in. (*Id.* at 468). She turned around and walked back through the garage where she was when she heard a gun fired. (*Id.* at 468). Ms. Asher saw Mr. Stephens standing up against the property line fence on the Ashers' property when he climbed back over the fence onto his own side. (*Id.* at

469). She had a discussion with her husband about what took place and went back into their house. (*Id.* at 470). Mr. Asher was very afraid. (*Id.*). She said he did not have a volatile temper or communicate with people by yelling and cursing at them. (*Id.* at 484). Ms. Asher recalled an officer coming to their home in 2014 to discuss the threats her husband had then been receiving from Mr. Stephens. (*Id.* at 495).

Mr. Asher testified in his own defense. After moving to the Garfield Road property, he had no disputes over property lines and did not remove any fences. (9/15/16 RP 513-14). He met Mr. Stephens and they got long for a while. (*Id.* at 514). Things changed with Mr. Stephens getting bossy about telling him what to do to take care of his property. (*Id.* at 517). Mr. Asher told him to leave him alone as they were not getting along and to stay away. (*Id.*). Mr. Stephens got more aggressive and called Mr. Asher names and cussing him out. (*Id.* at 518). Mr. Stephens said he would kick his ass and stomp his brains and threatened to kill him. (*Id.* at 518-19).

Mr. Asher put down an old mare and buried her, causing more conflict with Mr. Stephens. (9/15/16 RP 519-20). When he buried the horse, Mr. Stephens came up cussing him out and

calling him names. (*Id.* at 522). Every time Mr. Asher was out mowing the lawn or the grass on his fields, Mr. Stephens came out hollering and cussing at him. (*Id.* at 523). Mr. Asher said Mr. Stephens knew he had medical problems and was not going to fight him. (*Id.* at 524-25). Mr. Stephens had come over to Mr. Asher's side of the property before and he told him to stay on his own side. (*Id.* at 526-28).

As to the 2011 incident witnessed by Mr. Manuel, Mr. Asher was on a walk when Mr. Stephens came running out, yelling he was going to stomp and kill him since he finally caught him off his property. (9/15/16 RP 531). Mr. Asher told him Mr. Stephens he was not going to whip his ass, but he kept it up. (*Id.* at 532). Mr. Asher had a gun on him and he turned so Mr. Stephens could see it just to let him know he had it. (*Id.* at 533). His neighbor ran back home. (*Id.*).

Mr. Asher had put up a wire fence because Mr. Stephens told him if he did not, he would kill his dog. (9/15/16 RP 538). But he never had a problem with his dog getting off his property. (*Id.*). Mr. Asher did put a fence up. It was there for at least 5 years or longer and Mr. Stephens never said anything about it being on his

property until September 7, 2015. (*Id.* at 539). Mr. Asher put the fence on his side of the property. (*Id.* at 540).

On September 7, 2015, Mr. Asher went out to feed the horses when he heard a voice calling him. (9/15/16 RP 540-42). It was Mr. Stephens, who proceeded to call him an SOB and add he was going to come over, kill him, and tear his fence out. (*Id.* at 543). Mr. Asher told him to go back to his house and he would not. (*Id.*). Mr. Stephens started climbing the fence and was on top of it getting ready to jump off onto Mr. Asher's side. (*Id.* at 544). Mr. Asher took his gun out and warned him to stop, but he did not. (*Id.*).

Mr. Asher pretty much carried a gun on him most days as he was afraid of Mr. Stephens' threats. (9/15/16 RP 544). He came over the fence onto Mr. Asher's side of the property. (*Id.* at 545). Wondering what to do next, Mr. Asher took the gun out and held it. (*Id.*). He was 15 feet away from Mr. Stephens and had to do something to stop him. (*Id.* at 546). After the shot, Mr. Stephens froze up. He was still on Mr. Asher's property then, but left and did not say another word. (*Id.* at 547). Mr. Asher was concerned for his safety and was scared to death. (*Id.*).

Ms. Asher was there and they both went back into their house. (9/15/16 RP 549). Mr. Asher put the gun away and later called law enforcement. (*Id.*). They eventually arrived while he was out front. (*Id.* at 550). Deputy Kravtsov had a gun drawn on him. (*Id.* at 554). Mr. Asher was cuffed and taken to a patrol car. (*Id.* at 556). He told Deputy Kravtsov what happened. He did not tell him he went back into the house to get his gun and come back out with it. (*Id.* at 560).

Mr. Stephens had no permission to be on Mr. Asher's property. (9/15/16 RP 562-63). Mr. Asher did not point the gun at Mr. Stephens and just wanted to scare him back across the fence. (*Id.* at 598). He did not initiate the contact with Mr. Stephens that day. (*Id.* at 608).

The defense had no exceptions to the court's instructions. (9/19/16 RP 695). The jury convicted Mr. Asher of second degree assault with a firearm enhancement, but acquitted him of harassment. (CP 93-95). Although the defense asked for an exceptional sentence below the standard range because Mr. Stephens was an initiator and provoker of the incident to a significant degree, the court did not consider this request and sentenced him to a standard range of 39 months, including the 36-

month firearm enhancement. (CP 174, 178). This appeal follows. (CP 194).

III. ARGUMENT

A. The State's evidence was insufficient to support the conviction for second degree assault with a firearm enhancement as it failed to disprove self-defense beyond a reasonable doubt.

Mr. Asher acted in self-defense. The State must prove beyond a reasonable doubt every element of a charged crime. U.S. Const. amends. 5, 14; Wash. Const. art. 1, § 3; *In re Winship*, 397 U.S. 358, 364, 90 S. Ct. 1068, 25 L. Ed.2d 368 (1970). Since a claim of self-defense negates the essential element of intent for second degree assault, the burden is on the State to disprove self-defense beyond a reasonable doubt. *State v. Acosta*, 101 Wn.2d 612, 616, 683 P.2d 1069 (1984); *State v. Redwine*, 72 Wn. App. 625, 629, 865 P.2d 552, *review denied*, 124 Wn.2d 1012 (1994). The court gave a self-defense instruction here. (Instruction 16, CP 86).

For self-defense, the defendant must have subjectively feared he was in imminent danger of death or great bodily harm; this belief was objectively reasonable; the defendant exercised no greater force than was reasonably necessary; and the defendant

was not the aggressor. *State v. Callahan*, 87 Wn. App. 925, 929, 943 P.2d 676 (1997). Evidence of self-defense must be viewed “from the standpoint of the reasonably prudent person, knowing all the defendant knows and seeing all the defendant sees. *State v. Janes*, 121 Wn.2d 220, 238, 850 P.2d 495 (1993). The jury then is to stand in the shoes of the defendant, consider all the facts and circumstances known to him, and determine what a reasonable person in the same situation would have done. *Id.*

Confronting him at the property line, Mr. Stephens initiated the incident by telling Mr. Asher his fence had to come down. (9/13/16 RP 98). Mr. Stephens was going to come over, tear the fence out, kill his dog, and kill Mr. Asher. (9/15/16 RP 538, 543). Mr. Asher was concerned for his safety and scared to death of Mr. Stephens’ coming over the fence and stomping his head in. (*Id.* at 544-46). Mr. Asher shot his gun into the ground to scare and stop him. (*Id.* at 547). Even viewed in a light most favorable to the State, its evidence fell far short of disproving beyond a reasonable doubt that Mr. Asher acted in self-defense. *State v. Green*, 94 Wn.2d 216, 220-21, 616 P.2d 628 (1980).

The jury decides credibility, but it cannot find facts through guess, speculation, and conjecture. *State v. Hutton*, 7 Wn. App.

726, 728, 502 P.2d 1037 (1972). In order to find Mr. Asher did not act in self-defense beyond a reasonable doubt, the jury necessarily had to speculate, guess, and resort to conjecture to find facts supporting its determination the State had met its burden by the requisite quantum of proof. *Id.* The conviction must be reversed and the charge dismissed.

B. The court erred by failing to consider the defense request for an exceptional sentence below the standard range.

Mr. Asher asked for an exceptional sentence down based on the mitigating circumstance that willing participation by a victim is a factor to be considered. RCW 9.94A.535(1)(a); *State v. Clemens*, 78 Wn. App. 458, 464, 898 P.2d 324 (1995). Indeed, the SRA provides that certain failed defenses may constitute mitigating factors supporting an exceptional sentence below the standard range. *State v. Jeannotte*, 133 Wn.2d 847, 947 P.2d 1192 (1997).

The court in *State v. Hutsell*, 120 Wn.2d 913, 921-22, 845 P.2d 1325 (1993), noted the words of a respected commentator:

The Guidelines contain a number of mitigating factors applicable in situations where circumstances exist which tend to establish defenses to criminal liability but fail. In all these situations, if the defense were established, the conduct would be justified or excused, and thus would not constitute a crime at all. The inclusion of these factors as mitigating factors

recognizes that there will be situations in which a particular legal defense is not fully established, but where the circumstances that led to the crime, even though falling short of establishing a legal defense, justify distinguishing the conduct from that involved where those circumstances were not present. Allowing variations from the presumptive sentence range where factors exist which distinguish the blameworthiness of a particular defendant's conduct from that normally present in that crime is wholly consistent with the underlying principle. Certainly the fact that the substantive law treats these circumstances as complete defenses establishes the legitimacy of their use in determining relative degrees of blameworthiness for purposes of imposing punishment. (*Id.* at 921-22 (quoting D. Boerner, *Sentencing in Washington* 9-23 (1985)).

State v. Whitfield, 99 Wn. App. 331, 994 P.2d 222 (1999), supports the imposition of an exceptional sentence down for Mr. Asher. *Whitfield* involved a guilty plea to third degree assault where the trial court imposed a sentence below the standard range based on the mitigating factor that, to a significant degree, the victim was the provoker of the incident. The victim's "insistent verbal confrontation and provocation" justified distinguishing the defendant's conduct from the typical third degree assault. *Id.* at 336. This is that case where both admittedly had not a civil conversation in years. Although Mr. Asher's self-defense claim failed, Mr. Stephens' conduct as the provoker can properly be

considered as a mitigating circumstance. *State v. Smith*, 124 Wn. App. 417, 436-37, 102 P.3d 158 (2004).

Imposing a standard range sentence, the court failed to consider the exceptional sentence down despite the defense argument the victim was the initiator and provoked the incident to a significant degree, a mitigating factor. Discretion unexercised is discretion abused. *Bowcutt v. Delta N. Star Corp.*, 95 Wn. App. 311, 320, 976 P.2d 643 (1999). The court did not even consider Mr. Asher's request for an exceptional sentence down and therefore abused its discretion by refusing to exercise it. *Id.* Accordingly, the case must be remanded for resentencing so the court can indeed consider this mitigating factor.

V. CONCLUSION

Based on the foregoing facts and authorities, Mr. Asher respectfully urges this court to reverse his conviction and dismiss the charge or to remand for resentencing.

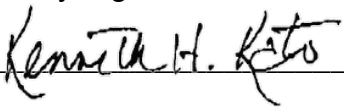
DATED this 24th day of September, 2017.



Kenneth H. Kato, WSBA # 6400
Attorney for Appellant
1020 N. Washington St.
Spokane, WA 99201
(509) 220-2237

CERTIFICATE OF SERVICE

I certify that on September 24, 2017, I served a copy of the brief of appellant by USPS on Willie Asher, # 394428 , PO Box 2049, Airway Heights, WA 99001, and through the efilng portal on Brian O'Brien at scpaappeals@spokanecounty.org.



September 24, 2017 - 8:17 PM

Transmittal Information

Filed with Court: Court of Appeals Division III
Appellate Court Case Number: 34902-1
Appellate Court Case Title: State of Washington v. Willie Charles Asher, Jr.
Superior Court Case Number: 15-1-03408-2

The following documents have been uploaded:

- 349021_Briefs_20170924201604D3485114_1678.pdf
This File Contains:
Briefs - Appellants
The Original File Name was asher brief 349021.pdf

A copy of the uploaded files will be sent to:

- bobrien@spokanecounty.org
- scpaappeals@spokanecounty.org

Comments:

Sender Name: Kenneth Kato - Email: khkato@comcast.net
Address:
1020 N WASHINGTON ST
SPOKANE, WA, 99201-2237
Phone: 509-220-2237

Note: The Filing Id is 20170924201604D3485114